

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MICHAEL C. MAYO,)	
)	
Plaintiff,)	Case No.: 1:21-cv-04653
)	
v.)	Hon. Judge John J. Tharp, Jr.
)	
LARRY GAVIN, KAREN JONES-)	
HAYES, DAMITA DELITZ, BRENDON)	
LOMBARDI, DIRECTOR MILLER,)	
OFFICER BUCHANAN, THOMAS)	
DART, AND LIEUTENANT DOUGE,)	
Defendants.)	
)	
)	
)	

**DEFENDANT, BRENDAN LOMBARDI'S UNOPPOSED MOTION FOR LEAVE TO
FILE HIS AMENDED ANSWER AND AFFIRMATIVE DEFENSES**

NOW COMES Defendant, BRENDAN LOMBARDI (“Defendant”), by and through his attorneys DeVore Radunsky LLC, and in support of this Unopposed Motion Seeking Leave to File an Amended Answer and Affirmative Defenses, Defendant states the following:

1. On June 16, 2022, Plaintiff filed his Third Amended Complaint (hereinafter “TAC”) against Defendant. (*Ex. 1, Plaintiff’s TAC*)

2. On September 13, 2022, Defendant filed his Answer to Plaintiff’s TAC. (*Ex. 2, Defendant Brendan Lombardi Answer to Plaintiff’s TAC*)

3. In his initial Answer to Plaintiff’s TAC, defendant Lombardi did not answer allegations #1-114. Instead, he only answered the allegations contained in paragraphs 150-158 or Counts VI and VII of Plaintiff’s TAC that were directed against him.

4. Defendant Lombardi now requests that he be permitted leave of court to answer the remaining allegations, paragraphs #1-114, of Plaintiff's TAC.

5. Allegations in paragraphs #115-149 of Plaintiffs TAC relate to other defendants for which Lombardi would make no answer.

6. Defendant's counsel has conferred with Plaintiff's counsel, and the plaintiff has no objection to the filing of this motion.

7. A draft of Defendant Lombardi's Amended Answer and Affirmative Defenses to Plaintiff's Third Amended Complaint is attached to this motion as Exhibit 3. (*Ex. 3, Draft of Lombardi's Amended Answer and Affirmative Defenses*)

WHEREFORE, Defendant BRENDON LOMBARDI, by and through his attorneys DeVore Radunsky LLC, respectfully requests this Honorable Court grant Defendant, Brendan Lombardi's Motion For Leave to File his Amended Answer and Affirmative Defenses.

Respectfully Submitted,

By: /s/ Troy S. Radunsky
Attorney for Defendants
ARDC# 6269281
DeVore Radunsky LLC
230 W. Monroe St., Ste 230
Chicago, Illinois 60606
tradunsky@devoreradunsky.com

/s/ David J. Zott

David J. Zott, P.C.
Vivek Biswas (*admitted pro hac vice*)
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, IL 60654
Telephone: (312) 862 2000
Facsimile: (312) 862-2200
Email: dzott@kirkland.com
Email: vivek.biswas@kirkland.com

John P. Hannon (*admitted pro hac vice*)
Jennifer M. Joslin (*admitted pro hac vice*)
KIRKLAND & ELLIS LLP
60 East South Temple
Salt Lake City, UT 84111
Telephone: (801) 877-8100
Facsimile: (801) 877-8101
Email: john.hannon@kirkland.com
Email: jennifer.joslin@kirkland.com

Attorneys for Plaintiff Michael C. Mayo

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on October 12, 2022, he electronically filed the foregoing document, which will send a notice of electronic filing to all counsel of record.

/s/ Troy S. Radunsky
Troy S. Radunsky